

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

PLANNED PARENTHOOD SOUTH
ATLANTIC; BEVERLY GRAY, M.D, on
behalf of themselves and their

Plaintiffs,

v.

JOSHUA STEIN, Attorney General of North Carolina, in his official capacity; TODD M. WILLIAMS, District Attorney (“DA”) for Prosecutorial District (“PD”) 40, in his official capacity; JIM O’NEILL, DA for PD 31, in his official capacity; SPENCER B. MERRIWEATHER III, DA for PD 26, in his official capacity; AVERY CRUMP, DA for PD 24, in her official capacity; JEFF NIEMAN, DA for PD 18, in his official capacity; SATANA DEBERRY, DA for PD 16, in her official capacity; WILLIAM WEST, DA for PD 14, in his official capacity; LORRIN FREEMAN, DA for PD 10, in her official capacity; BENJAMIN R. DAVID, DA for PD 6, in his official capacity; KODY H. KINSLEY, M.P.P., Secretary of the North Carolina Department of Health and Human Services, in his official capacity; MICHAUX R. KILPATRICK, M.D., PhD., President of the North Carolina Medical Board, in her official capacity, on behalf of herself, the board and its Members; RACQUEL INGRAM, PhD., R.N., Chair of the North Carolina Board of Nursing, in her official capacity, on behalf of herself, the Board and its members; and their employees, agents, and successors,

Defendants.

CIVIL ACTION

Case No. 1:23-cv-00480-CCE-LPA

NOTICE OF SPECIAL APPEARANCE AND SUBSTITUTION OF COUNSEL

Pursuant to Local Rule 83.1(d-e), the undersigned counsel hereby provides this Court with notice of the special appearance in the above-captioned civil action of Anjali Salvador as substitution for counsel Peter Im. In support thereof, the undersigned counsel states as follows:

1. Anjali Salvador is a licensed attorney in good standing of the bar of the states of New York (Bar # 5380811) and Texas (Bar # 24110324). She has also been admitted to the bars of the U.S. Court of Appeals for the Fifth Circuit, the U.S. District Courts for the Southern and Eastern Districts of New York, and the U.S. District Courts for the Southern and Eastern Districts of Texas. She is a Senior Staff Attorney in the Public Policy Litigation and Law department at Planned Parenthood Federation of America, 123 William St., 11th Floor, New York, NY 10038, and may be reached at (212) 261-4602 and anjali.salvador@ppfa.org.
2. Peter Im respectfully requests the Clerk of the Court to withdraw his appearance as counsel for Plaintiff Planned Parenthood South Atlantic in this action. Ms. Salvador, his colleague in the Public Policy Litigation and Law department at Planned Parenthood Federation of America, will substitute for Mr. Im as counsel for Plaintiff Planned Parenthood South Atlantic. Ms. Salvador agrees that she will be responsible for ensuring the presence of an attorney who is familiar with the case and has authority to

control the litigation at all conferences, hearings, trials, and other proceedings, and that she submits to the disciplinary jurisdiction of the Court for any misconduct in connection with this litigation. She is aware of and will comply with all pending deadlines in this action.

WHEREFORE, notice of the special appearance of Anjali Salvador and withdrawal of Peter Im is hereby provided to this Court. Ms. Salvador asks that she be noted as counsel of record for Plaintiff Planned Parenthood South Atlantic in this proceeding.

RESPECTFULLY SUBMITTED this 24th day of July, 2023.

/s/ Kristi Graunke

Kristi Graunke
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COUNSEL FOR PLAINTIFFS

/s/ Anjali Salvador

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/s/ Peter Im

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COUNSEL FOR PLANNED
PARENTHOOD SOUTH ATLANTIC

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of July, 2023, I electronically filed the foregoing NOTICE OF SPECIAL APPEARANCE AND SUBSTITUTION OF COUNSEL with the clerk of court by using the CM/ECF system, which will send a notice of electronic filing.

/s/ Anjali Salvador

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